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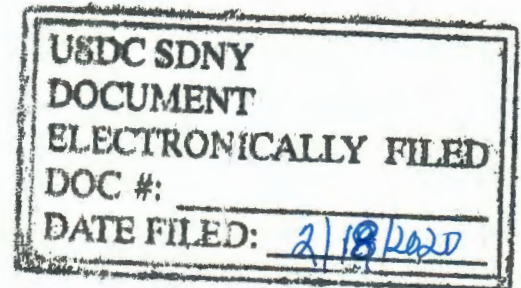
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February 14, 2020

VIA ECF

Honorable Judge Sidney H. Stein
United States District Court
Southern District of New York
500 Pearl Street
New York, NY 10007

MEMO ENDORSED



Re: Cause No. 1:87-cr-00593, *United States of America v. Victor Torres and Jorge Torres*, in the United States District Court, Southern District of New York.

Dear Judge Stein:

Jeff Ansley and I, both with the law firm Bell Nunnally & Martin LLP, represent Victor Torres and Jorge Torres for purposes of attempting to achieve a reduction of their life sentences pursuant to the revised provisions of 18 U.S.C. § 3582(c)(1)(A) provided for in the First Step Act.

The memorandum of law that we intend to file will be a combination of a motion for a sentence reduction and a traditional sentencing memorandum. We note that this Court's Individual Rules of Practice limit moving papers (at least in civil cases) to 25 pages. We therefore write to respectfully request permission to file an extended memorandum of law of approximately 50 pages, which we believe is necessary to provide this Court with a complete analysis of the legal basis for Victor Torres and Jorge Torres' sentence reduction motion, the long procedural history of Victor Torres and Jorge Torres' case, and the numerous "extraordinary and compelling reasons" that we believe support a reduction of their life sentences. I have spoken with the Deputy Criminal Chief of the Southern District of New York's United States Attorney's Office, Andrew Dember, who consents to this request.

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Thank you for your consideration and attention to this matter.

Respectfully submitted,

Arianna Goodman

cc: Andrew Dember, Assistant United States Attorney (via email)
Jeff Ansley (of the firm)
Brittany K. Barnett (via email)

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SO ORDERED 2/18/2020

SIDNEY H. STEIN
U.S.D.J.